

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

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SUPER 8 MOTELS, INC.)
Plaintiff,)
v.) 2:06 CV 206-DRB
JALA INVESTMENTS, INC.,)
HIMAT, INC., CHANDRAKANT)
PATEL, and DHIRAJLAL PATEL)
Defendants.)

CLERK'S OFFICE
M.D. OF ALABAMA
MIDDLE DISTRICT

ANSWER

COMES NOW, the defendant, JALA Investments, Inc., in the above-styled cause and for answer to the plaintiff's complaint states as follows:

FIRST DEFENSE

This defendant pleads not guilty.

SECOND DEFENSE

This defendant pleads that venue is improper.

THIRD DEFENSE

This defendant pleads that service is improper.

FOURTH DEFENSE

This defendant denies each and every material allegation and demands strict proof thereof.

FIFTH DEFENSE

This defendant pleads the affirmative defense of contributory negligence.

SIXTH DEFENSE

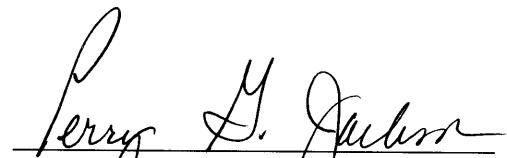
This defendant denies that the plaintiff is injured to the extent as alleged in the complaint and demands strict proof thereof.

EIGHTH DEFENSE

This defendant states that this matter is due to be dismissed as the complaint was filed outside of the applicable statute of limitations.

NINTH DEFENSE

This defendant specifically reserves the right to amend its answer as future discovery may dictate.



Perry G. Jackson, Attorney for
Defendant JALA Investments, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that I have this the 27th day of March, 2006, served a copy of the foregoing to all attorneys of record by placing of copy of same in the United States Mail, postage prepaid and properly addressed as follows:

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